

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**JOHN MASON, IV, *ET AL.*,**

**PLAINTIFFS,**

**v.**

**MIKE HALE, *ET AL.*,**

**DEFENDANTS.**

**CASE NO. 2:11-CV-03155-TMP**

**JOINT MOTION FOR APPROVAL OF CLASS SETTLEMENT**

COME NOW all parties to the above entitled action and jointly move this Court for approval of class settlement regarding conditions at the Jefferson County Jail in Birmingham, Alabama and evidence thereof state as follows:

1. Plaintiffs filed this lawsuit in 2011 as a class action lawsuit claiming that the overcrowded conditions at the Jefferson County Jail in Birmingham, Alabama constituted violations of the inmates civil rights, most notably the right to be free from cruel and unusual punishment.
2. Defendants each denied liability and extensive discovery was conducted.
3. In November of 2013, this Court granted Plaintiffs' Motion for Class Certification and certified a class of current and future inmates in the Jefferson County Jail under Rule 23(b)(2) of the Federal Rules of Civil Procedure.
4. On March 11, 2014, all parties via respective counsel reached a proposed settlement agreement which is attached as Exhibit 1 to this motion.
5. All parties have also reviewed the proposed notice of class settlement attached as Exhibit 2 to this motion.

6. All parties believe that this proposed settlement is fair and just and represents a favorable outcome to this lawsuit.

WHEREFORE, all parties pray this Court enter an Order approving the proposed settlement in accordance with Rule 23 of the Federal Rules of Civil Procedure.

Respectfully submitted,

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